



370 Lexington Avenue, Suite 1101

New York, NY 10017

Tel (646) 560-3224

Fax (207) 421-9215

geronlegaladvisors.com

Yann Geron

ygeron@geronlegaladvisors.com

August 8, 2023

VIA EMAIL (PB.CHAMBERS@NYSB.USCOURTS.GOV)

Greg White, Courtroom Deputy
The Honorable Philip Bentley
United States Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: [Symbiont.io, LLC, Debtor; Case No. 22-11620-pb](#)

Dear Mr. White:

I serve as interim Chapter 7 trustee of the bankruptcy estate of Symbiont.io, LLC, the above-referenced debtor. This letter is to confirm that, at my request and upon the consent of movants, the hearing on the Employee Creditors' Motion to Lift Automatic Stay to Permit Arbitration of Claims [DE 101] (the "Motion"), which was scheduled to be heard on August 15, 2023, is being adjourned. We understand from movants' counsel that Judge Bentley may be available to hear the Motion on September 7, 2023, at 2:00 p.m. Eastern. We write to confirm this date.

Based upon this adjourned hearing date, counsel for the parties have agreed that the new deadline for objections to the Motion will be August 25, 2023, and the new deadline for any reply by movants will be September 1, 2023. The parties have agreed that movants waive the automatic lifting of the stay pursuant to Section 362(e) of the Bankruptcy Code pending final resolution of the Motion.

Please let us know whether the September 7 hearing date is acceptable to Chambers so we can file a notice of adjournment and proceed with the other agreed upon dates.

Respectfully,

/s/ Yann Geron

Yann Geron

cc (via email): Bruce Menken, Esq.

Brenna Rabinowitz, Esq.

Nicole N. Santucci, Esq.